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2 (*admitted pro hac vice*)
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8
9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE DISTRICT OF ARIZONA**

11
12 **IN RE: BARD IVC FILTER PRODUCTS**
13 **LIABILITY LITIGATION**

14 This document relates to:

15 *VIRGINIA PLOTT,*

16 *Plaintiff,*

17 *v.*

18 *C.R. BARD AND BARD PERIPHERAL*
19 *VASCULAR, INC.*

20 *Defendants.*

21 **MDL No. 2:15-MD-02641-PHX-DGC**

22 **Civil Action No. 2:17-cv-03572-DGC**

23 **STIPULATION OF DISMISSAL**
24 **WITHOUT PREJUDICE**

25
26 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Virginia Plott, and
27 Defendants, C.R. Bard and Bard Peripheral Vascular, Inc., through their undersigned counsel, that
28 the above-captioned action is voluntarily dismissed, without prejudice, pursuant to Federal Rule of
Civil Procedure 41(a)(1)(A)(ii), and without costs or fees to any party.

29 The voluntary dismissal will only apply to docket number 2:17-cv-03572-DGC and will not have
30 any effect on any other cases filed in regard to Plaintiff Virginia Plott with different docket numbers.

31 Dated this 23rd day of July, 2019.

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4 Respectfully submitted,

5 /s/ William B. Curtis
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23 **Attorneys for Defendants**

24 **CERTIFICATE OF SERVICE**

25 I hereby certify that on this 23rd day of July 2019, I electronically transmitted the attached
26 document to the Clerk's Office using the CM/ECF System which will automatically send email
27 notification of such filing to all attorneys of record.

28 /s/ William Curtis
29 WILLIAM CURTIS